

Message

From: Villanueva, Philip [Villanueva.Philip@epa.gov]
Sent: 1/12/2021 4:44:06 PM
To: Blankinship, Amy [Blankinship.Amy@epa.gov]
CC: Metzger, Michael [Metzger.Michael@epa.gov]
Subject: RE: aldicarb NMC
Attachments: D460600.mem.docx

Hi Amy,

Yes, we got this out this morning. Please see attached.

Phil

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Tuesday, January 12, 2021 11:41 AM
To: Villanueva, Philip <Villanueva.Philip@epa.gov>
Cc: Metzger, Michael <Metzger.Michael@epa.gov>
Subject: FW: aldicarb NMC
Importance: High

Hi Phil,

Just following up on the email from Don yesterday. Are you putting this into a memo format for signature?

Thanks,
Amy

From: Wilbur, Donald <Wilbur.Donald@epa.gov>
Sent: Monday, January 11, 2021 3:58 PM
To: Villanueva, Philip <Villanueva.Philip@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>
Cc: Metzger, Michael <Metzger.Michael@epa.gov>
Subject: RE: aldicarb NMC
Importance: High

This needs to be put into a memo and be ready for finalization ASAP – or first thing tomorrow morning (1/12) at the latest.

It needs to be CBI cleared and loaded into the docket by COB Tuesday 1/12 per RD.

Donald Wilbur

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From: Villanueva, Philip <Villanueva.Philip@epa.gov>
Sent: Thursday, January 7, 2021 5:21 PM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>
Cc: Wilbur, Donald <Wilbur.Donald@epa.gov>; Metzger, Michael <Metzger.Michael@epa.gov>
Subject: RE: aldicarb NMC

Thanks Amy. I figured out how to display my updates using track changes. Pretty much the same document, but makes my edits explicit.

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Thursday, January 07, 2021 5:09 PM
To: Villanueva, Philip <Villanueva.Philip@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>
Cc: Wilbur, Donald <Wilbur.Donald@epa.gov>; Metzger, Michael <Metzger.Michael@epa.gov>
Subject: RE: aldicarb NMC

Hi,

I don't have any comments.

Thanks,
Amy

From: Villanueva, Philip <Villanueva.Philip@epa.gov>
Sent: Thursday, January 07, 2021 3:00 PM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>
Cc: Wilbur, Donald <Wilbur.Donald@epa.gov>; Metzger, Michael <Metzger.Michael@epa.gov>
Subject: RE: aldicarb NMC

All,

Attached is a draft that combines the characterization of the expected impact of the proposed aldicarb-citrus use on NMC cumulative exposure through food and water. Please provide comments and feedback. Sorry I didn't think to turn on track changes until later.

Phil

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Thursday, January 07, 2021 10:15 AM
To: Villanueva, Philip <Villanueva.Philip@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>
Cc: Wilbur, Donald <Wilbur.Donald@epa.gov>; Metzger, Michael <Metzger.Michael@epa.gov>
Subject: RE: aldicarb NMC

Phil, to confirm yes, what you have is the most recent EFED version

Amy

From: Villanueva, Philip <Villanueva.Philip@epa.gov>
Sent: Wednesday, January 06, 2021 12:30 PM
To: Vogel, Dana <Vogel.Dana@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>
Cc: Wilbur, Donald <Wilbur.Donald@epa.gov>; Metzger, Michael <Metzger.Michael@epa.gov>
Subject: RE: aldicarb NMC

I'll put that together and send around to this group for comment.

From: Vogel, Dana <Vogel.Dana@epa.gov>
Sent: Wednesday, January 06, 2021 8:25 AM
To: Villanueva, Philip <Villanueva.Philip@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>
Cc: Wilbur, Donald <Wilbur.Donald@epa.gov>; Metzger, Michael <Metzger.Michael@epa.gov>
Subject: RE: aldicarb NMC

Thanks Phil,
Since RD and OGC want a stand alone document on the mc cra, please put together a memo that includes the HED and EFED rationales and circulate for comment.

Thx,

Dv

From: Villanueva, Philip <Villanueva.Philip@epa.gov>
Sent: Wednesday, January 06, 2021 8:22 AM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>
Cc: Wilbur, Donald <Wilbur.Donald@epa.gov>; Metzger, Michael <Metzger.Michael@epa.gov>
Subject: RE: aldicarb NMC

All,

I've added Dana to the email and attached the latest version of both the EFED and HED one-pagers. @Blankinship, Amy please confirm the attached EFED document is the latest version. It would be good to hear Dana's thoughts on next steps.

Phil

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Wednesday, January 06, 2021 7:48 AM
To: Miller, David <Miller.DavidJ@epa.gov>
Cc: Wilbur, Donald <Wilbur.Donald@epa.gov>; Metzger, Michael <Metzger.Michael@epa.gov>; Villanueva, Philip <Villanueva.Philip@epa.gov>
Subject: RE: aldicarb NMC

Thanks David, I'll be sure to work with Mike on it.

From: Miller, David <Miller.DavidJ@epa.gov>
Sent: Wednesday, January 06, 2021 7:46 AM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>
Cc: Wilbur, Donald <Wilbur.Donald@epa.gov>; Metzger, Michael <Metzger.Michael@epa.gov>; Villanueva, Philip <Villanueva.Philip@epa.gov>
Subject: RE: aldicarb NMC

Amy,

Mike M. is most familiar with the whole aldicarb story since it is in his branch, so he might be best situated to recommend where this information is best incorporated and how it might be best incorporated into any write-up.

David

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Wednesday, January 06, 2021 7:42 AM
To: Villanueva, Philip <Villanueva.Philip@epa.gov>
Cc: Wilbur, Donald <Wilbur.Donald@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>; Metzger, Michael <Metzger.Michael@epa.gov>
Subject: RE: aldicarb NMC

Thanks Phil. I'm open to how best to incorporate this information, but my inclination would be to capture it somewhere in HED documents and not our DWA per se.

Amy

From: Villanueva, Philip <Villanueva.Philip@epa.gov>
Sent: Tuesday, January 05, 2021 6:00 PM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>
Cc: Wilbur, Donald <Wilbur.Donald@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>; Metzger, Michael <Metzger.Michael@epa.gov>
Subject: RE: aldicarb NMC

Hi Amy,

I put together the attached one-pager. Mike's team inserted the first paragraph into the risk assessment to characterize the potential impact of the citrus use on the NMC CRA. The aldicarb team would know best, but it might be helpful to incorporate some of the DW rationale into the HH risk assessment.

Phil

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Tuesday, January 05, 2021 2:27 PM
To: Villanueva, Philip <Villanueva.Philip@epa.gov>
Cc: Wilbur, Donald <Wilbur.Donald@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>; Metzger, Michael <Metzger.Michael@epa.gov>
Subject: RE: aldicarb NMC

Hi Phil and HED team,

In discussing several eco aspects of the aldicarb new use with RD and OGC today, I brought up EFED and HED's write-up that we did scoping out the cumulative issue. I asked them if they needed anything formal from our end on this or if

emails and our discussions would be enough. OGC suggested that having something more formal would be good for the administrative record. As such, I'm reaching out to you to let you know this, and to get your thoughts on how best to present our write-ups? RD and OGC didn't have a preferred way they would like the information presented and asked for us to talk about how we would want to do it. For example, maybe we could combine our write-up with yours and then maybe attach to the dietary assessment?

I can set up a quick call to talk it through if that would be helpful.

Amy

From: Villanueva, Philip <Villanueva.Philip@epa.gov>
Sent: Thursday, December 10, 2020 3:07 PM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Thurman, Nelson <Thurman.Nelson@epa.gov>
Cc: Matuszko, Jan <Matuszko.Jan@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>
Subject: RE: aldicarb NMC

Amy and Nelson,

Please find attached a bulleted one-pager to give you a sense of the tack we're taking to characterize food exposure for the aldicarb use on citrus. **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP) Also, we've been working on a tox-adjusted exposure index based on the RPFs published in the 2007 NMC CRA which tracks changes in food exposures over time. When we plug in the highest years of aldicarb citrus data from PDP, it doesn't materially affect the food exposure estimates at the 99.9th percentile of exposure. I'm transforming this into a paragraph and will send it along.

Phil

From: Villanueva, Philip
Sent: Wednesday, December 09, 2020 5:04 PM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>; Thurman, Nelson <Thurman.Nelson@epa.gov>
Cc: Matuszko, Jan <Matuszko.Jan@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>
Subject: RE: aldicarb NMC

Thanks Amy, I'll have a version to share with you tomorrow. My BC is looking at the draft I sent over to him. Looks like

Ex. 5 Deliberative Process (DP)

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Wednesday, December 09, 2020 4:44 PM
To: Thurman, Nelson <Thurman.Nelson@epa.gov>; Villanueva, Philip <Villanueva.Philip@epa.gov>
Cc: Matuszko, Jan <Matuszko.Jan@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>
Subject: RE: aldicarb NMC

Hi Phil,

Attached is our draft write-up. If you would like to meet to discuss this more in the context of the dietary perspective, let me know and I'll set something up.

Thanks,
Amy

From: Thurman, Nelson <Thurman.Nelson@epa.gov>
Sent: Wednesday, December 09, 2020 7:24 AM
To: Villanueva, Philip <Villanueva.Philip@epa.gov>
Cc: Blankinship, Amy <Blankinship.Amy@epa.gov>
Subject: RE: aldicarb NMC

Thanks, Phil. I'm looking over Amy's draft now and will provide some input on that. If you don't mind, I'll include you in the loop so you can provide some feedback from how this might best fit into the dietary perspective.

n

From: Villanueva, Philip <Villanueva.Philip@epa.gov>
Sent: Tuesday, December 8, 2020 5:00 PM
To: Thurman, Nelson <Thurman.Nelson@epa.gov>
Subject: RE: aldicarb NMC

I meant NMC CRA. I've got OPs on the brain with our epi update schedule we've been discussing for this summer.

From: Villanueva, Philip
Sent: Tuesday, December 08, 2020 4:38 PM
To: Thurman, Nelson <Thurman.Nelson@epa.gov>
Subject: FW: aldicarb NMC

Hi Nelson,

I'm working on characterizing the dietary exposure expected due to aldicarb use on citrus in the context of cumulative OP exposures. I'm working the dietary angle. Let me know if you want to chat or have ideas you want to bounce off. The plan is that both EFED and HED have something to share Thursday afternoon. Hope all is well with you and your family is staying healthy and safe.

Phil

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Tuesday, December 08, 2020 4:30 PM
To: Villanueva, Philip <Villanueva.Philip@epa.gov>
Subject: RE: aldicarb NMC

Hi Phil,

I am working with Nelson on this given his history with the cumulative. We hope to have something ready to share by Thursday afternoon.

Amy

From: Villanueva, Philip <Villanueva.Philip@epa.gov>
Sent: Tuesday, December 08, 2020 4:27 PM
To: Blankinship, Amy <Blankinship.Amy@epa.gov>
Subject: FW: aldicarb NMC

Hi Amy,

I understand you're going to be providing some characterization of the impact on DW exposure due to aldicarb use on citrus in the context of the cumulative risk assessment for the OPs. I'm working on the dietary exposure portion. HED is aiming for a one-pager to describe the dietary portion. Let me know your thoughts on sharing our findings/thoughts as Don suggests below.

Thanks,
Phil

From: Wilbur, Donald <Wilbur.Donald@epa.gov>
Sent: Tuesday, December 08, 2020 1:44 PM
To: Vogel, Dana <Vogel.Dana@epa.gov>
Cc: Villanueva, Philip <Villanueva.Philip@epa.gov>; Metzger, Michael <Metzger.Michael@epa.gov>
Subject: RE: aldicarb NMC

It looks like EFED is ready to go on this now!

Phil – Do you want to reach out to Amy and start whipping up the CRA 1-pager?

Donald Wilbur
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From: Vogel, Dana <Vogel.Dana@epa.gov>
Sent: Tuesday, December 8, 2020 1:34 PM
To: Wilbur, Donald <Wilbur.Donald@epa.gov>
Subject: FW: aldicarb NMC

From: Blankinship, Amy <Blankinship.Amy@epa.gov>
Sent: Tuesday, December 08, 2020 12:55 PM
To: Metzger, Michael <Metzger.Michael@epa.gov>
Cc: Matuszko, Jan <Matuszko.Jan@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Subject: aldicarb NMC

Hi,

We were able to discuss again within EFED what the inclusion of this new action for aldicarb would mean for the DWA in the NMC cumulative. We are comfortable/okay with the new action in terms of the DWA in the cumulative and are planning on writing this up (a paragraph or so). We are targeting having a draft to share by Thursday afternoon to have in time for the Alex briefing on Friday.

Let me know if you have any questions.

Amy

Amy Blankinship
Branch Chief, ERB2
USEPA – OCSPP/OPP/EFED
703-347-8062